

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

ELECTRONIC APPLICATION OF SOUTH)
KENTUCKY RURAL ELECTRIC COOPERATIVE) CASE NO.
CORPORATION FOR APPROVAL OF MASTER) 2018-00050
POWER PURCHASE AND SALE AGREEMENT)
AND TRANSACTIONS THEREUNDER)

COMMISSION STAFF'S FIRST REQUEST FOR INFORMATION TO
JOINT INTERVENORS

Big Sandy Rural Electric Cooperative Corporation, Blue Grass Energy Cooperative Corporation, Clark Energy Cooperative, Inc., Farmers Rural Electric Cooperative Corporation, Fleming-Mason Energy Cooperative, Inc., Inter-County Energy Cooperative Corporation, Licking Valley Rural Electric Cooperative Corporation, and Nolin Rural Electric Cooperative Corporation (collectively, "Joint Intervenors"), pursuant to 807 KAR 5:001, are to file with the Commission an original in paper medium and an electronic version of the following information, with a copy to all parties of record. The information requested herein is due on or before April 27, 2018. Responses to requests for information in paper medium shall be appropriately bound, tabbed, and indexed. Each response shall include the name of the witness responsible for responding to the questions related to the information provided.

Each response shall be answered under oath or, for representatives of a public or private corporation or a partnership or association or a governmental agency, be accompanied by a signed certification of the preparer or person supervising the preparation of the response on behalf of the entity that the response is true and accurate

to the best of that person's knowledge, information, and belief formed after a reasonable inquiry.

The Joint Intervenors shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect. For any request to which the Joint Intervenors fails or refuses to furnish all or part of the requested information, it shall provide a written explanation of the specific grounds for its failure to completely and precisely respond.

Careful attention should be given to copied material to ensure that it is legible. When the requested information has been previously provided in this proceeding in the requested format, reference may be made to the specific location of that information in responding to this request. When filing a paper containing personal information, the Joint Intervenors shall, in accordance with 807 KAR 5:001, Section 4(10), encrypt or redact the paper so that personal information cannot be read.

1. Refer to the Direct Testimony of John Wolfram ("Wolfram Testimony"), page 13, lines 14–15. Mr. Wolfram suggests East Kentucky could design new base rates that would "properly compensate EKPC for serving South Kentucky's remaining load."

a. Explain what is meant by this statement.

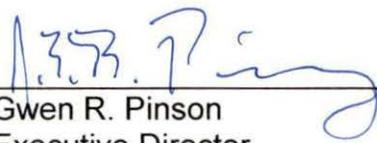
b. Explain if Mr. Wolfram is suggesting that East Kentucky should design new rates to assign any or all of the stranded costs to only South Kentucky.

2. Refer to the Wolfram Testimony, page 15, lines 2 through 5. Explain in detail what "significant problems" are anticipated, the factors that determine whether and

to what extent significant problems will arise, the likelihood of each significant problem identified, and the anticipated effect.

3. Provide copies of all supporting calculations and documentation for the Wolfram Testimony and all schedules provided in your responses in Excel spreadsheet format with formulas intact and unprotected, and all rows and columns fully accessible.

4. Refer to the Direct Testimony of William T. Prather, page 6, lines 10–15. Provide evidentiary support for the statement that Amendment 3 was required in connection with an East Kentucky financing case, and that “[t]he additional terms in Amendment No. 3, allowing purchase by a distribution cooperative of alternately-sourced power, represent concessions EKPC had to make to induce all its members to agree to extension of the term of the wholesale power contracts.”


For _____
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DATED APR 20 2018

cc: Parties of Record

Case No. 2018-00050

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